



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL
CLEANUP

April 7, 2014

Mr. Bob Wyatt
Chairman, Lower Willamette Group
c/o Northwest Natural
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site, Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
Comments on the Remedial Investigation Report (Section 6) dated August 29, 2011

Dear Mr. Wyatt;

EPA and its partners have reviewed the revised draft Remedial Investigation Report submitted to EPA on August 29, 2011. We are sending you the enclosed comments on Section 6 of the revised draft RI report using the process agreed upon by EPA and LWG. EPA has modified Section 6 to add clarity, reduce redundancy or irrelevant information and present information consistent with the EPA's RI/FS guidance. EPA is providing the comments on Section 6 in redline format. EPA has no substantive comment on Appendix E. It should be noted that all references to text, tables, maps and figures in other sections may need to be revised based on EPA's comments on those sections. Tables, maps and figures, as well as Appendix E, may need to be modified based on language modifications made in Section 6.

The LWG has 30 days to review and provide comments on each section. Since EPA is providing these comments early, the LWG will have until June 11, 2014, to review and provide EPA comments on Section 6 based upon the agreed schedule dated May 1, 2014. If the LWG has any questions or clarifications that are needed regarding EPA's comments, we would be happy to discuss them with you at any time. Once the LWG has provided its comments to EPA during the review period, a meeting to discuss those comments will be set if EPA disagrees with any of the LWG's comments.

According to the agreed process, if EPA and LWG project managers cannot come to agreement on resolution of the comments, the issues will be elevated to the senior managers for resolution. Under the phased comment approach proposal, the formal dispute process time frame under the AOC will not apply on EPA's comments provided on individual sections, but rather will apply when all sections have been reviewed by LWG and comments discussed with EPA and there are still unresolved issues.

We expect that the LWG will be incorporating our modified text and making other changes to the RI as we provide our comments. We appreciate your willingness to work with us to complete this report and move forward to clean up of the Portland Harbor Superfund site. We are implementing our proposed process for review of the RI deliverables to keep the project moving, however, we understand the senior managers are still discussing this proposal and it may be modified.

If you have any questions regarding this letter, please contact me at (206) 553-6705, or koch.kristine@epa.gov. All legal inquiries should be directed to Lori Cora at (206) 553-1115, or cora.lori@epa.gov.

Sincerely,

Kristine Koch
Remedial Project Manager

encl. (sent via email)

cc: Mr. Jim Anderson
Oregon Department of Environmental Quality

Mr. Rob Neely
National Oceanic and Atmospheric Administration

Mr. Ted Buerger
U.S. Fish and Wildlife Service
Mr. Brian Cunningham
Confederated Tribes of the Warm Springs Reservation of Oregon

Ms. Rose Longoria
Confederated Tribes and Bands of the Yakama Nation

Mr. Michael Karnosh
Confederated Tribes of the Grand Ronde Community of Oregon

Mr. Tom Downey
Confederated Tribes of the Siletz Indians

Mr. Audie Huber
Confederated Tribes of the Umatilla Indian Reservation

Ms. Erin Madden
Nez Perce Tribe

Mr. Greg Ulirsch
ATSDR

Mr. Kurt Burkholder
Oregon Department of Justice

Mr. Todd Hudson
Oregon Health Authority

Mr. Rick Keppler
Oregon Department of Fish and Wildlife